CINNAMON MUELLER

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September 1, 2005

Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re: Liberty Cablevision of Puerto Rico, Ltd. ("Liberty Cablevision")
September 1, 2005 Subscriber Notification Report
WC Docket No. 05-196

Dear Ms. Dortch:

We write on behalf of Liberty Cablevision. This Report updates Liberty Cablevision's compliance with the customer notification requirements of 47 CFR § 9.5.¹

Percentage of subscribers to whom Liberty Cablevision has delivered notices and warning stickers. Liberty Cablevision has notified 100% of its VoIP customers of the limitations on its Liberty Voice Links ("LVL") service. At the time of installation, Liberty Cablevision provides its customers with a written advisory that warns customers of the circumstances under which its E911 services may not be available, or may be limited in comparison to traditional E911 service.² In addition, Liberty Cablevision will mail a second advisory on September 7, 2005. Liberty Cablevision has

As with your traditional telephone service, you can make emergency 911 calls using Liberty Voice Links cable telephone service. In an emergency situation, you may dial 9-1-1 on your Cable Telephone and you will be connected to the same emergency management system that your current telephone service uses. However, your Cable Telephone is connected to a cable modem, which requires electricity in order to operate. During a power outage, your cable modem will not operate, which means that your Liberty Voice Links telephone service will not be available. In such a situation, you will need an alternate means to communicate (for example, a cellular phone) in order to contact the emergency services professionals.

¹ Liberty Cablevision is submitting a Motion to Accept Late-Filed Subscriber Notification Report concurrently with this report.

² The English translation of the advisory reads:

not yet been able to provide its customers with warning stickers because it is just now receiving the stickers from its vendor. Those stickers will be mailed with the second advisory on September 7, 2005.

Percent of subscribers from whom Liberty Cablevision has obtained affirmative acknowledgements. Liberty Cablevision has not yet been able to provide its customers with acknowledgement forms because it is just now receiving the forms and return envelopes from its vendor. The forms will be sent with the second advisory and warning stickers on September 7, 2005. Liberty Cablevision expects to receive affirmative acknowledgements from the majority of its LVL customers by September 28, 2005.

Liberty Cablevision's planned actions toward customers who do not affirmatively acknowledge having received and understood the advisory. Liberty Cablevision's fixed LVL product provides subscribers with a robust E911 service that includes reliable customer location information. Further, Liberty Cablevision has already warned its customers of the limitations on its VoIP services during a power outage, and will be sending out a second warning, stickers, and acknowledgment forms in less than a week. In light of these compliance efforts, Liberty Cablevision believes that it would be a greater detriment to public safety to disconnect these subscribers, or to perform a soft or warm disconnect, than to leave the subscribers' LVL service connected while Liberty Cablevision continues its efforts to obtain acknowledgements.

If you have any further questions, please contact me.

Regards,

Nicole Paolini-Subramanya Attorney for Liberty Cablevision of Puerto Rico, Ltd.